

MICHAEL CHASTAINE, State Bar #121209
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Attorney for Defendant
Erica Arceo

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:11 CR 054 GEB
Plaintiff,)	
v.)	STIPULATION AND ORDER
)	CONTINUING STATUS HEARING
ERICA ARCEO et al.,)	
Defendants.)	

Defendant Erica Arceo, by and through her attorney, Michael Chastaine, Victor Alvarado, by and through his attorney Bruce Locke, Nicolo Arceo by and through his attorney, J. Toney, Christopher Jackson, by and through his attorney Douglas Beevers, Michael Bolden, by and through his attorney Timothy Warriner and the United States, by and through Assistant United States Attorney Matthew Segal, hereby stipulate and agree to continue the status hearing in the above-captioned case from Friday, April 20 2012 at 9:00 a.m. to Friday, May 18, 2012 at 9:00 a.m. It is further stipulated that the above referenced time period should be excluded from calculation under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(8)(A) and local rules T4. The continuance is requested to continue settlement negotiations.

The parties further agree and stipulate that the time period from the filing of this Stipulation until May 18, 2012 should be excluded in computing time for commencement of trial under the Speedy Trial Act, based upon the interest of justice under 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T4, to allow continuity of counsel and to allow reasonable

1 time necessary for effective defense preparation. It is further agreed and stipulated that the ends
2 of justice served in granting the request outweigh the best interests of the public and the
3 defendant in a speedy trial.
4

5 Dated: April 19, 2012

The CHASTAINE LAW OFFICE

7 By: /s/ Michael Chastaine
MICHAEL CHASTAINE
8 Attorney for Erica Arceo

9 Dated: April 19, 2012

10 By: /s/ J. Toney
J. TONEY
11 Attorney for Nicolo Arceo

12 Dated: April 19, 2012

13 By: /s/ Douglas Beevers
DOUGLAS BEEVERS
14 Attorney for Christopher Jackson

15 Dated: April 19, 2012

16 By: /s/ Timothy Warriner
TIMOTHY WARRINER
17 Attorney for Michael Bolden

18 Dated: April 19, 2012

19 By: /s/ Bruce Locke
BRUCE LOCKE
20 Attorney for Victor Alvarado

21 Dated: April 19, 2012

BENJAMIN B. WAGNER
22 United States Attorney

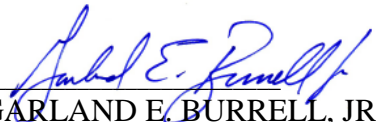
23
24 By: /s/ Matthew Segal
MATTHEW SEGAL
25 Assistant U.S. Attorney
26
27
28

ORDER

GOOD CAUSE APPEARING, in that it is the stipulation of the parties:

IT IS HEREBY ORDERED that the status conference scheduled for Friday April 20, 2012 at 9:00 a.m. be continued to Friday May 18, 2012 at 9:00 a.m. and that the period from April 20, 2012 to May 18, 2012 is excludable from calculation under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(8)(A). The Court further finds that the interests of justice served by the exclusion of time granted herein outweigh the interests of the defendant and the public in a speedy trial.

Date: 4/19/2012


GARLAND E. BURRELL, JR.
United States District Judge